

1 MORGAN, LEWIS & BOCKIUS LLP
2 ANDREW J. GRAY IV, (SBN 202137)
3 agray@morganlewis.com
4 MICHAEL F. CARR, (SBN 259911)
5 mcarr@morganlewis.com
6 2 Palo Alto Square
7 3000 El Camino Real, Suite 700
8 Palo Alto, CA 94306
9 Tel: 650.843.4000
10 Fax: 650.843.4001

11 Attorneys for Applicants
12 LG ELECTRONICS DEUTSCHLAND GMBH and
13 LG ELECTRONICS JAPAN, INC.

14 UNITED STATES DISTRICT COURT
15 SOUTHERN DISTRICT OF CALIFORNIA

16 *In re Ex Parte* Application of,

17 LG ELECTRONICS DEUTSCHLAND
18 GMBH and LG ELECTRONICS JAPAN, INC.

19 Applicants,

20 For an Order Pursuant to 28 U.S.C. § 1782
21 Granting Leave to Obtain Discovery from
22 Qualcomm Incorporated for Use in Foreign
23 Proceedings.

Case No.: 12CV1197-LAB (MDD)

24 **MOTION FOR ENTRY OF**
25 **STIPULATED PROTECTIVE ORDER**
26 **REGARDING MATERIALS**
27 **PRODUCED BY QUALCOMM**
28 **INCORPORATED**

1 Applicants LG Electronics Deutschland GmbH and LG Electronics Japan, Inc.
 2 (collectively "LGE") hereby move the Court to enter the proposed protective order that has been
 3 concurrently submitted via e-mail to the Chambers of U.S. Magistrate Judge Mitchell D. Dembin
 4 pursuant to Electronic Case Filing Administrative Policies and Procedures Section 2(h).
 5 Qualcomm Incorporated has indicated that documents or information containing or reflecting
 6 confidential, proprietary, trade secret, and/or commercially sensitive information are likely to be
 7 disclosed or produced in response to the subpoena served by LGE in this matter.

8 LGE has conferred with counsel for Qualcomm Incorporated regarding the proposed
 9 protective order and counsel for Qualcomm Incorporated stipulates to entry of the protective
 10 order that has been concurrently submitted via e-mail to Judge Mitchell D. Dembin's Chambers.

11
 12 Dated: May 30, 2012

MORGAN, LEWIS & BOCKIUS LLP

13
 14 By /s Andrew J. Gray IV
 15 ANDREW J. GRAY IV

16 Attorneys for Applicants
 17 LG ELECTRONICS DEUTSCHLAND
 18 GMBH and LG ELECTRONICS JAPAN,
 19 INC.
 20
 21
 22
 23
 24
 25
 26
 27
 28

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically. In addition, counsel indicated below was served with a true and correct copy of the foregoing by email and U.S. mail on this the 30th day of May, 2012:

John A. Scott
jascott@qualcomm.com
Vice President, Legal Counsel
Qualcomm Incorporated
5775 Morehouse Drive
San Diego, CA 92121

Attorney for Qualcomm Incorporated

/s Michael F. Carr
MICHAEL F. CARR